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6 **UNITED STATES DISTRICT COURT**

7 **FOR THE DISTRICT OF NEVADA**

8 KRISTIN TRUEMAN, an Individual,

9 Plaintiff,

10 vs.

11 CLARK COUNTY, a political subdivision of
the State of Nevada; DOES I - X; and ROE
12 CORPORATIONS I-X, inclusive,

13 Defendants.

14 Case No.: 2:16-cv-02558-JCM-CWH
Hon. James C. Mahan

15 **STIPULATION AND ORDER TO STAY
DISCOVERY**

16 **(FIRST REQUEST)**

17 **Related Case: Case No. 2:15-cv-01872-RFB-
NJK**

18 KRISTIN TRUEMAN (“Trueman”), by and through her counsel of record, Ryan Alexander,
and Defendant CLARK COUNTY by and through its counsel Robert J. Gower, Esq., respectfully
move for the entry of the attached proposed Stipulation for a Limited Stay of Discovery until such
time that Defendant’s Motion to Dismiss may be heard and decided.

19 The Complaint in this case was filed on November 4, 2016. A subsequent Motion to Dismiss
20 was filed by Defendant CLARK COUNTY on December 21, 2016. There is also a pending Motion
to Dismiss in related case 2:15-cv-01872-RFB-NJK that could be dispositive of the case. The parties
21 agree that a stay of discovery proceedings until Defendant’s Motion to Dismiss would be beneficial
22 to the Parties and conserve efficient use of the Court’s resources while the Motion to Dismiss is
23 decided. The parties shall confer and submit their Discovery Plan and Scheduling Order within
24 twenty (20) days of the ruling on the Defendant’s Motion to Dismiss.

1
2 KRISTIN TRUEMAN ("Trueman"), by and through her counsel of record, Ryan Alexander,
3 and Defendant CLARK COUNTY by and through its counsel Robert F. Gower, Esq,
4

5 **HEREBY STIPULATE AND AGREE** that the deadline for Plaintiff and Defendant to hold
6 their Rule 26(f) conference and file their proposed Discovery Plan and Scheduling Order, and any
7 other FRCP 26(f) duties, be stayed until this Court rules on Defendant's Motion to Dismiss;

8 This stay is not brought in bad faith or for purposes of delay.
9

10 **IT IS SO STIPULATED.**

11 DATED this 9th day of February, 2017.
12

13 RYAN ALEXANDER, CHTD.
14

15 /s/Ryan Alexander
16

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CLARK COUNTY DISTRICT ATTORNEY'S
OFFICE - CIVIL DIVISION

/s/Robert J. Gower, Esq.

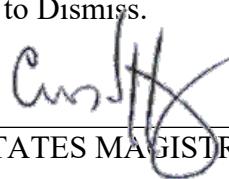
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Email: Robert.Gower@ClarkCountyDA.com
Attorneys for Defendants LVMPD and Former
Sheriff Doug Gillespie

21 **IT IS SO ORDERED:**

22 The parties' stipulation to stay all FRCP 26(f) duties, including submission of a proposed
23 Discovery Plan and Scheduling Order, until after an Order is entered on Defendant's Motion to
24 Dismiss, is granted. The parties shall confer and submit their Discovery Plan and Scheduling Order
25 within twenty (20) days of the ruling on the Defendant's Motion to Dismiss.

26
27 DATED: 2/10/17
28

UNITED STATES MAGISTRATE JUDGE



CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Ryan Alexander Chtd., and on the 9th day of February 2017, the foregoing STIPULATION AND ORDER TO STAY DISCOVERY was served by CM/ECF system upon:

Robert J. Gower, Esq.
Clark County District Attorney's Office
Civil Division
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Attorney for Defendants Clark County

/s/Ryan Alexander

An Employee of Ryan Alexander, Chtd.